

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE
CENTRAL DISTRICT OF CALIFORNIA

JENNIFER BENTLEY,
Plaintiff,

Civil Action No.: 15-CV-07870-DMG

v.
UNITED OF OMAHA LIFE INSURANCE COMPANY,
Defendant.

**DECLARATION OF THE NORTHWESTERN MUTUAL LIFE INSURANCE COMPANY
AS ITS RESPONSE TO A SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION,
OR OBJECTS IN A CIVIL ACTION**

I, Paula Storniolo, declare as follows:

1. This declaration is submitted, by agreement, as The Northwestern Mutual Life Insurance Company's response to a subpoena issued to it in the above matter, dated October 13, 2017.

2. I am an Assistant Director of Integrated Risk Regulatory Services and have been employed by Northwestern Mutual for thirty-two years. In this role, I have personal knowledge of the matters discussed herein.

3. Attached as **Exhibit 1** is a true and correct copy of the form of the 2016 Annual Policy Statement provided to Northwestern Mutual policy owners whose policies were issued or delivered in California. Annual Policy Statements are provided to policy owners on an annual basis at the time of the policy anniversary.

4. If a policy owner designates a secondary addressee, the secondary addressee receives copies of certain notices including, the Urgent Notice or a letter to owner as explained in #5 immediately below and the Lapse Notice and Offer to Reinstate.

5. If the premium payer and the policy owner are different or the policy premiums are being paid through an Insurance Service Account (an account that could also pay premiums for other policies owned by others) and the premiums are not paid, a letter is triggered at the same time the

Urgent Notice is sent to the premium payer. The letter will also be sent to a designated secondary addressee as well. This letter is sent rather than a copy of the Urgent Notice as the Urgent Notice could identify unrelated policies owed by others. **Exhibit 2** is a sample copy of the letter.

6. Since January 1, 2013, for policies issued or delivered in California (whether issued or delivered before or after 2013), Northwestern Mutual has included in the Annual Policy Statement a notice reminding the policy owner that he/she could designate a secondary addressee to receive copies of policy notices and other documents/letters. Designation of secondary addressees, and changes to such designations by policy owners, are accepted by Northwestern Mutual at any time during the year and as often as the policy owner desires.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8 day of November, 2017 at Milwaukee, Wisconsin.

A handwritten signature in cursive script, reading "Paula Storniolo", is written over a horizontal line.

Paula Storniolo